

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

U.S. DISTRICT COURT  
DISTRICT OF MAINE  
RECEIVED & FILED  
DEPUTY CLERK

UNITED STATES OF AMERICA

Mag. No: 1:23-mj-00188-JCN P 3 19<sup>2023</sup>

v.

ALAN HOWELL PARROT

DEPUTY CLERK

**MOTION FOR DETENTION**

The United States moves for pretrial detention of the defendant, pursuant to 18 U.S.C. § 3142.

1. Eligibility of Case. This case is eligible for a detention order because the case involves:

- Conditions requiring a temporary detention order (18 U.S.C. § 3142(d))
- Crime of violence
- Maximum sentence life imprisonment or death
- 10+ year drug offense
- Felony, with two prior convictions in above categories
- Serious risk defendant will flee
- Serious risk obstruction of justice

2. Reasons for Detention.

(i) Temporary Detention. \_\_\_\_\_

(ii) Other than Temporary Detention. The court should detain the defendant because there are no conditions of release which will reasonably assure:

Defendant's appearance as required

Safety of any other person and the community

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against the defendant under 18 U.S.C. § 3142(e). The presumption applies because:

- Probable cause to believe the defendant committed 10+ year drug offense or an offense under 18 U.S.C. § 924(c).
- Previous conviction for "eligible" offense committed while on pretrial bond.

4. Date of Detention Hearing. The United States requests that the detention hearing be conducted following a continuance of three days.

5. Length of Detention Hearing. The United States will require a half hour to present its case for detention.

6. Other Relevant Matters. N/A

Date: June 22, 2023

DARCIE N. MCELWEE  
United States Attorney

BY: /s/ JOEL B. CASEY  
JOEL B. CASEY  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 22, 2023, I filed the Government's Motion for Detention with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to the following:

James Nixon, Esq.  
Counsel for the Defendant

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